

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

DENISE SNYDER, Administrator
of the Estate of Bryan Bargar,

Plaintiff,

v.

UNITED STATES,

Defendant.

)
)
)
)
)
)
)
)

CASE NO.: 19-cv-770

JUDGE: Hon. Sara Lioi

JOINT STATUS REPORT OF THE PARTIES

Per the Court's Case Management Plan [Doc. 21], the parties offer the following procedural joint status report.

(1) Discovery during this reporting period:

Plaintiff has taken depositions of two fact witnesses, and the parties are working to schedule additional depositions on February 6, 7, 10, 11, 14, and 20.

Defendant has produced to Plaintiff in this action documents that were also produced in the related action, *Brittany Bentley v. United States*, No. 19-cv-680, responsive to the *Bentley* Plaintiff's First Request for Production. Defendant has designated a large number of documents as "Protected Material" under the Stipulated Protective Order. Plaintiff intends to challenge the designations of most of the documents produced by Defendant.

(2) Settlement discussions during this reporting period:

None

(3) Motions that have been filed or remain pending during this reporting period:

None.

(4) Developments potentially leading to case schedule deviations:

Several of the soldiers whom Plaintiff has identified for deposition are forward deployed to the Middle East. The deployed soldiers are under the United States Central Command while deployed and their availability for depositions is based on their operational tempo. Their immediate higher headquarters is the 30th Armor Brigade Combat Team, and Defendant's counsel is coordinating with the 30th ABCT Brigade Judge Advocate to set dates and times for telephonic depositions within the time allotted for fact discovery by the Court.

Respectfully submitted,

LANDSKRONER GREICO MERRIMAN
LLC

/s/ Tom Merriman

Tom Merriman (0040906)
Drew Legando (0084209)
1360 West 9th Street, Suite 200
Cleveland, OH 44113
(216) 522-9000 (phone)
(216) 552-9007 (fax)
tom@lgmlegal.com
drew@lgmlegal.com
Attorneys for Plaintiff

JOSEPH H. HUNT
Assistant Attorney General
Civil Division

JAMES G. TOUHEY, JR.
Director, Torts Branch

/s/ Robin Doyle Smith

ROBIN DOYLE SMITH (41010)
Senior Trial Counsel
Torts Branch
United States Department of Justice
P.O. Box 888
Washington, DC 20044
(202) 616-4289 (phone)
(202) 616-5200 (fax)
Robin.Doyle.Smith@usdoj.gov

Attorneys for Defendant
UNITED STATES OF AMERICA